



North County Watch

Looking Out Today For Tomorrow

Mr. Murry Wilson
SLO County Planning and Building

Sent Via Email

June 5, 2013

Re: Additional Comments on Las Pilitas Quarry DEIR - Recreation

Dear Murry,

North County Watch is a 501 3c non-profit Public Benefit corporation. We are an all-volunteer organization committed to sustainable development in and around north San Luis Obispo County.

We are submitting additional comments on Recreation the Draft EIR for the Las Pilitas Quarry.

4.10 RECREATION

4.10.1 Existing Conditions

Existing Conditions as described in this DEIR are incomplete.

Public recreation plans and facilities in the unincorporated areas of San Luis Obispo County are the responsibility of two different agencies, each with their own planning documents. One is the County Bicycle Plan produced by the county Department of Public Works. This Plan must be included and addressed in this DEIR.

The other document is the County General Plan Parks and Recreation Element (PRE) produced by General Services Agency County Parks, which we believe has not been addressed completely.

Tourism had a direct influence in the development and adoption of the 2006 Parks and Recreation Element. Tourism needs to be addressed in the DEIR for its contribution to recreational demands. As stated in the PRE on page 8:

“Tourism is the county’s largest industry, contributing \$1billion to our local economy each year and providing over 16,000 jobs. The tourist trade also generates approximately \$60 million in sales and hotel taxes for local government. About twelve percent of the county’s workforce is engaged in tourism.”

Page 1 of 1

This data came from the San Luis Obispo County Visitors & Conference Bureau at the time the PRE was prepared.

A proposed trail corridor along the Salinas River is identified in the PRE. This condition has been correctly identified. However the importance and recreational impact of this corridor has been overlooked. See section 4.10.2 for discussion.

Existing conditions must also include recreational demand caused by changes to nearby Santa Margarita. Santa Margarita will be experiencing significant growth when the 2008 approved Santa Margarita Ranch agricultural cluster subdivision is constructed. This will bring approximately 110 new households to the area. Future plans for the Ranch are based on tourism and tourist services. These latter plans were tentatively and conceptually approved, as part of the certification of ag cluster residential project EIR by the Board of Supervisors.

4.10.2 San Luis Obispo County Plan and Policies

In our opinion the DEIR Table 4.10-1 Policy Consistency Analysis – Recreation imparts no useful information on which to perform a CEQA analysis.

This DEIR must include the plans and policies for Class I, II and III bike lanes that can be found in the county Bicycle Plan. Pertaining to Class I bike lanes, county Public Works, county Parks and Recreation Agency, and SLOCOG often work cooperatively.

Concerning the Salinas River corridor, there are two applicable Park and Recreation Element goals and objectives. As previously stated tourism is an important economic engine in the county. Visitors are included in the recreation goal that extends to a countywide trail system of which the Salinas River corridor is a part.

Recreation Goals, Objectives and Policies

GOAL #2: Recreation that serves the County's residents and visitors, various age groups, varying economic situations and physical abilities.

GENERAL RECREATION:

Trails

OBJECTIVE C: Provide a viable multi-use trail system which is protective of private property interests and public resources, and consistent with Chapter 8 Parks and Recreation Project List.

The Salinas River is also recognized as a natural area to be preserved and enhanced as opportunities arise. The entire corridor is included in the various sub-area tables as potential natural area including the one cited in this DEIR.

Special Places Goal, Objectives, and Policies

GOAL #4: Natural areas preserved within the County that protect unique and sensitive resources.

OBJECTIVE F: Provide natural areas consistent with Chapter 8 Parks and Recreation Project List, and/or the County's Agriculture and Open Space Element.

4.10.3 Regulatory Setting – no comment

4.10.4 Assessment Methodology

Again, we believe Table 4.10.1 Policy Consistency Analysis – Recreation imparts no useful information.

The methodology is micro when a macro approach should have been taken. If the existing conditions were expanded as we suggest and the PRE goals and objectives cited as we suggest, a more meaningful assessment would have been achieved.

4.10.5 Significance Criteria – This is a statement of fact not requiring a comment.

4.10.6 Project Impact and Mitigation Measures

Increased User Demand

While the proposed project will not increase household demands for recreation, existing approved project(s) such as the 110-house Santa Margarita Ranch cluster sub-division will. The Ranch has numerous recreation facilities; while privately owned, they are open to the public. These by their very existence increase public demand for local recreation.

The DEIR assessment for user demand is also flawed because it has failed to take into consideration (countywide) tourism, the county's largest industry. Consideration of the project site and its sub-regional location is not sufficient. The Salinas River corridor is better viewed on a countywide map showing the county trail system. The county map shows Salinas River corridor trails connecting cities and towns and how this backbone river trail corridor branches off to connect to parks and other destinations.

The DEIR has not assessed the impact of current projects in the vicinity. One is the Garden Farms to Santa Margarita trail – this is a generous property owner easement donation and a section of the Juan Bautista de Anza Historic Trail, Anza Trail for short. Another is the Salinas River Corridor Master Trail Plan project funded by a \$350,000 grant – this encompasses 35-miles from Santa Margarita to San Miguel with SLOCOG as lead agency with the cities, county, CalTrans, National Park Service and others.

Besides the examples cited above, a continuous trail from Santa Margarita Lake to Nacimiento Lake is largely in the Salinas River corridor. Entirely in the river corridor is a continuous trail from Santa Margarita Lake to the Monterey County line. Both are in the county PRE.

Effect on Access to Trails, Parks or Other Recreation Opportunities

None of the Rural Land uses mentioned under this topic in the DEIR are incompatible with a public trail. However since the project site is located adjacent to and near numerous large lot residential properties, there is a reasonable possibility these residents and friends might enjoy a nearby trail.

Cumulative Effects

It is clearly evident that some time in the foreseeable future, less than twenty-five years, there will be numerous sections of public trail along the Salinas River open to the public. Therefore North County Watch encourages County Parks to require a trail easement as a condition of project approval and that easement is placed in the county trail easement inventory without any conditional restrictions (such as time limits or other land uses) per current county procedures.

We also recommend additional mitigation for quarrying and other long-term destructive activities on or near the project site. The mitigation should be incorporated into the state required and locally reviewed and approved Reclamation Plan along with a required endowment. Such mitigation might establish restoration of the mined area to include a publicly accessible Salinas River Natural Area as well as funds for long-range maintenance. Said area would be calculated and identified to compensate for the impacts identified in the entire DEIR.

North County Watch Summary

In our opinion, the CEQA assessment of impacts to recreation is incomplete. We encourage County Planning to require these deficiencies be remedied and that the Recreation section of the DEIR be re-circulated.

The deficiencies are:

1. Failed to include County Bike Plan and Class I, II, and III bike lanes in existing conditions
2. Failed to adequately detail existing conditions on which to analyze recreation impacts (reasons stated above)
3. Failed to cite the appropriate PRE goals and objective in which to perform an analysis
4. Failed to incorporate approved project(s) in the project site area, mainly in Santa Margarita
5. Failed to evaluate the demand for recreation related to tourism in Santa Margarita and project vicinity
6. Failed to evaluate the importance of the Salinas River trail corridor and Salinas River natural area designation

Sincerely,



Susan Harvey, President
(805)239-0542